

May 6, 2002

To the National Organic Standards Board Livestock Committee:

This testimony is presented on behalf of Wholesome Harvest, a coalition of organic certified pastured livestock farmers in the Midwest. Wholesome Harvest producers successfully raise poultry on pasture. Wende Elliott is an organic certified farmer raising pastured chicken, turkey and duck. She is also the coordinator for the coalition.

Wholesome Harvest sees the current and proposed organic standards for poultry insufficient because they promote heavily concentrated feedlot and confinement production. We see pasturing of poultry to be the only production standard that will stop factory style production of organic poultry. Pasturing poultry meets consumer expectations and improves environmental stewardship and humane treatment of animals.

Consumers Drive the Organic Food Movement

In the 286,000 recent comments from consumers, the number four comment was no factory farming practices. The current and proposed standards that allow high density feedlot or confinement of organic poultry will negatively degrade the validity of the organic label for all other organic food products, from organic milk to strawberries. Wholesome Harvest agrees with today's testimony by the National Campaign for Sustainable Agriculture, that it is very disturbing that a key issue such as organic feedlots is only raised obliquely at best without the benefit of informed public comment. Consumers are not stupid and when they find out that organic poultry was hijacked by vertically integrated factory farms, consumers will become cynical and not seek out the organic label any longer. Consumers will make assumptions about the veracity of other organic food products and the USDA will have killed the goose that laid the golden egg, to use a poultry metaphor.

Poultry Access to Pasture vs. Feedlot

The consumer who purchases organic free range poultry is not visualizing millions of birds being produced in a corporate feedlot. The consumer wants to buy poultry raised on pasture by family farmers. The organic movement is successful because of differentiation. The less organic poultry is differentiated from corporate confinement poultry, the more likely consumers will abandon it and other organic food products. A member of the NOSB suggested that I give up asking for pasture requirements and just



invent our own label. We will gladly and successfully nationally promote pastured organic birds from family farms. Just realize that our differentiation is what the consumer wants and forcing us to develop our own label will be the death of consumer interest in the organic certified corporate feedlot chicken that you are considering advocating today.

The current wording and loopholes will without a doubt result in factory farming of all organic poultry by vertically integrated food corporations. They will produce the meat cheaper than the family farmer and commodify and monopolize the market. Petaluma Poultry exemplifies the current state of organic poultry products now available to consumers in grocery stores. In a press release dated February 1, 2002 American Capital mezzanine fund announced investing \$8.5 million in Petaluma, which they describe as the dominant player, with several hundred employees, that operates a hatchery, multiple chicken ranches, a processing plant, and a feed mill.

Recommended Standard language should be modified as follows:

1. Organically managed poultry must have access to outdoor pasture. The producer's organic system plan must illustrate how the producer will maximize and encourage access to the outdoor pasture. All producers must identify and be able to meet the outdoor pasturing requirement prior to the producer seeking to justify any temporary confinement of poultry as described in 2.

Wholesome Harvest agrees with language in section 2, providing language is changed in section 1.

As you go into private committee meetings, and hear some committee members possibly talk about how ludicrous or dangerous pasturing poultry is, realize that some of your committee members make a living from feedlot and confinement organic poultry production. Requiring pasturing of all organic animals, including poultry, will cost them. It will require the dominant players in the organic poultry industry to retool and reduce their production. It will open up space in the market for poultry already being produced on pasture by family farmers. I am sure that the NOSB members and USDA employees are not concerned about protecting the market domination by a particular corporation and are more concerned for protecting the integrity of the organic standards and representing American consumer, the organic family farm, the humane treatment of animals and environmental stewardship when you make your decision.

The testimony you hear today is not about animals getting sick, it is about how food companies can quickly capitalize on the exponential growth in consumer demand for organic meat. It is about how easy it will be for a couple big players to keep the corner on the market if the standards stay lax. It is about the fact that 96% of organic food sales occur in the grocery store, and only 4% are farmer direct at farmers markets. It is wrong to assign organic family farmers to the 4% ghetto and hand the organic label to the companies who already control poultry sales 96% of the time and want to keep it that way.

Environmental benefits of Pasturing vs. Feedlots

Chickens deposit nutrients on the pasture while they range and then work them into the soil. No environmental problems associated with concentrated feedlot and confinement manure run off exist at pastured poultry family farms. Neither are there environmental problems associated with the mechanical over application of manure in an effort to dump manure from landless animal facilities. Additionally there is less dependency on fossil fuels for hauling manure away as the pastured chicken applies it for the farmer

Requiring pasturing will charge the farmer with responsible land stewardship in a flexible and practical way, as different farms and regions will require different sizes and designs of pasture. The simple language of requiring access to living pasture frees the NOSB from trying to define square footage requirement or flock sizes. It accomplishes the NOSB goals of improving the environment without onerous quantitative limitations that may not be applicable to a specific farm or challengeable in court.

Please know that I am a Northern producer and am aware of hundreds of northern pasture poultry producers. We produce organic poultry as a seasonal enterprise on our farms. We are happy about this, as seasonal variety in activities is a big reason we are farmers. If we wanted to do the same thing every day, we would work in a season less factory. I know of only 4 northern producers that want to continue to produce poultry in confinement in the winter and label it organic. Please know that 2 members of the livestock committee represent those 4 farmers.

Humane Treatment of Animals and Health Concerns

Wholesome Harvest agrees with the scientific testimony today by the Humane Society of the United States as they state that the natural behavior patterns of poultry include foraging for plants and insects and exploring a varied, extensive environment. Certainly, concrete or dirt feedlots don't provide these behavioral needs. The Leopold Center conducted a thorough literature search in April 2002 in light of this hearing and found 0 reports of health epidemics in pastured flocks on family farms. Instead Leopold Center found that all reports of pathogenic crises were created in large high density confinement operations.

Wholesome Harvest also agrees with the recommendations of the Wallace Institute previously submitted, that "the term 'access to the outdoors' should be interpreted as the ability of an animal to move freely from its enclosure into an open air environment with suitable ground cover. The simulation of a natural environment is a cornerstone provision in organic livestock production systems." The Wallace Institute also wrote, "Our preference is that poultry producers provide managed pasture."

Studies are indicating that grass fed animals are more nutritious for humans than feedlot animals, so it is just logical that what is good for the earth, and is the closest to the animal's natural habits, is also healthy for us. The 50 year experiment in factory confinement of animals is an experiment that has run its course and demonstrated major problems for family farms, environmental quality, rural communities and quality of life

for animals. The organic movement was intended to turn away from this paradigm, not endorse it.

Respectfully Submitted,



Wende Elliott
Organic poultry producer and coalition coordinator

Supporting Documentation also submitted on May 6, 2002:

H.A. Wallace Institute for Alternative Agriculture, Issue Paper #1, December 1998
(30 copies)

see comments #1 and #4

Petaluma Press release, February 1, 2002 (30 copies)

SARE Bulletin on Livestock Alternatives, January 2002 (1 bound magazine)

Consumer petition for pastured poultry (30 copies)

Animal Welfare Institute and University of Minnesota, technical working papers on
environmental impact and farm animal health and well-being (1 CD)

May 6, 2002

To: USDA

We, consumers who are interested in buying organic meat that is raised in environmentally responsible manner that offers humane treatment of animals, are opposed to confinement production of poultry as being allowed under organic standards. We demand free range for poultry labelled and marketed as organic certified, and we prefer to buy pasture raised poultry because we see it as the best environmental stewardship and most closely in line with natural poultry behavior patterns.



organic poultry must be free range

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9.	Holly Lincoln	Washington	DC	
8.	Noel Petrie	Washington	DC	
7.	christina salvi	Brooklyn	NY	
6.	Helaine Lerner	NY	NY	Dagostino
5.	Hannah Johns	Moline	KS	Dillons in Wichita on N Rock Road
4.	Diane Hatz	New York	NY	Pranna Foods, NY NY
3.	Suzanne Stewart	Des Moines	IA	Dahl's/New City Market/Pioneer Coop
2.	Mark Bequeaith	Des Moines	IA	Dahl's, New City Market, Pioneer Coop
1.	joseph rude	colo	iowa	hyvee

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43. Caroline Kirk	Pawling	NY	ELLA'S BREWSTER, NY
42. Stephanie Makrias	Norwood	NJ	King's/Cresskill NJ
41. Olga Makrias	New York	New York	
40. Amrit Hansmeyer	Chula Vista, CA USA	California	
39. Dayna Rittenberg	San Francisco	CA	Real Foods Fillmore/Union
38. Steven Meskill	Santa Ana	Ca.	Whole Foods
37. Benny	Whitestone	New York	Waldbaum's
36. Kelly A Wilson	Pipersville	Pa	
35. Ken White	Highlands Ranch	CO	
34. Lisa Hochman	Cresskill	NJ	
33. Cristina Galdames	Vienna	Virginia	Fresh Field
32. Doug MacDonald	New York City	New York	Key Food/Avenue A
31. Donna Calvao	San Diego	CA	Trader Joe's Pacific Beach
30. Kathryn Compton	Overbrook	Kansas	The Mercantile, Lawrence, KS
29. Julieann Pavesi	Los Angeles	CA	Whole Foods
28. Dan Caldas	Washington	DC	
27. Marlene Aibinder	Ridgefield	CT	
26. Shannon M. Ryan	New York	NY	
25. sidney lerner	nyc	ny	
24. Chesley Hicks	New York	NY	Prana Foods, 125 First Ave., NYC
23. Eric Jaquay	New York	NY	Prana Foods, 1st Avenue, NYC
22. Leslie Seff	New York	NY	D'Agostino's/Greenwich St., NYC
21. Leslie Okladek	New York	NY	D'Agostino's/Bethune St, NYC
20. Jeffrey Odefey	White Plains	NY	
19. Kathy Hiltsley	Minnetonka	MN	The Wedge/Byerlys
18. Maryna Harrison	brooklyn	ny	c-town
17. Emily Darrow	Rhinebeck	NY	Tiberio IGA/Red Hook
16. Assenka Oksiloff	Roosevelt	NJ	
15. Claudia Malloy	Washington	DC	Fresh Fields
14. Maggie Thompson	Washington	DC	
13. Andrew Wheeler	philadelphia	pa	

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61. cathy livingston	cedar Falls	Ia.	
60. Melanie Shepherdson	Washington	DC	
59. G. David Hurd	Des Moines	Iowa	Dahls - 35th and Ingersoll
58. Charles Winterwood	Dubuque	Iowa	Eagles Country market-Dubuque
57. Diane Halverson	Northfield	MN	Econofoods, County Market, Northfield
56. Jean Allgood	Iowa City	IA	
55. Kim Shelquist	Madrid	Ia	Fareway
54. Tommi Makila	Des Moines	Iowa	
53. Kyla Zaro-Moore	Minneapolis	MN	
52. Jennifer Peterson	Washington	DC	
51. Sandy Adair	Lansdale	PA	ACME-Lansdale
50. Christy O'Neill	Canterbury	CT	
49. Kim Moncavage	West Windsor	NJ	McCaffrey's /West Windsor
48. Patricia Lovera	Washington	DC	
47. Todd Hoffman	Laurel	MD	Burtonsville, MD
46. Stacey Osborne	South San Francisco	CA	
45. Dorothee E.Krahn	Silver Spring	MD	Giant Food

	R.N.			
94.	Robin Kraft	bethlehem	PA	
93.	Brian Peppler	Laurel	MD	Mom's, College Park, MD
92.	Rob Woodruff	Gaithersburg	Maryland	Whole Foods, Kentlands, Gaithersburg
	Jessica Woodruff	Gaithersburg	MD	Whole Foods Market, Gaithersburg, MD
90.	Miriam Heinonen	New Milford	CT	Edge of the Woods, New Haven
89.	Schuyler Waynforth	Albuquerque	NM	La Montanita Coop
88.	larry lombard	emmett	idaho	albertson/boise
87.	Mary Giddings	Potlatch	Idaho	Rosauers
86.	Amanda Wiges	Poway	CA	
85.	Rachel Loshak	new york	ny	whole foods supermarket
84.	Dawn Witzke	Graettinger	IA	
83.	Lorinda Langner	Underwood,	IA	
82.	Carolyn	Sea Cliff	NY	
81.	Kelly Dunn	Boston	MA	Bread & Circus, Brookline, MA
	Jason Stein	Saint Louis Park	MN	
79.	Doreen Nidey	Iowa City	Iowa	New Pioneer Co-op; Cub Foods; Hy-Vee
78.	James McGovern	New York	NY	
77.	Jill Bressler	Brooklyn	NY	
76.	Morgan Taylor	New York	NY	Whole Foods, Manhattan
75.	Alice Bierhorst	New York	NY	Prana
74.	Robert Price	New York	NY	
73.	Muffy Harmon	Des Moines	Iowa	
72.	Andrew L Martini	philadelphia	PA	
71.	Peggy Murdock	Ames	Iowa	Wheatsfield, HyVee, John's Natural Foods
70.	David Osterberg	Mt. Vernon	IA	
69.	Brenda L. Carey	Walnut Creek	CA	Whole Foods / Walnut Creek
68.	Mark Belwood	Marshall	Missouri	Aldi's
67.	Terry Spence	Unionville	MO	Hy-Vee
66.	Jim Gannon	corning	ca	
65.	Alannah Atley	Coralville	IA	New Pioneer Coop
64.	Wataru Sugiyama	Ashland	Oregon	Shop'in Kart
63.	Vicky Usser	Toronto	On, Canada	



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111.	m g jones	glen rock	pa	giant
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109.	Mrs Maggie Bentley	Waterlooville	Hants	Sainsbury's Farlington
108.	Kathleen A. Whitley	Bridgehampton	NY	Trader Joes
107.	alexis bush	storrs	ct	
106.	Asha Goldstein	Berkeley	CA	
105.	Monica S. Willett	Harrisburg	PA	Giant Foods, Inc., Harrisburg
104.	melinda bashen	hollywood	fl	
103.	Danila Oder	Los Angeles	CA	
102.	Christina Kochan	Vernon	NJ	Healthy Thymes/Vernon
101.	Craig Usher	Sacramento	CA	Craig Usher
100.	Coleen Burnham	San Diego	CA	Ralphs
99.	Alex Hershaft	Bethesda	MD	Giant Foods, Georgetown Square
98.	Ronnie Wright	St. Petersburg	FL	
97.	Steven Jay Gross	Harvard	Illinois	
96.	Richard G. Cardella	Hydesville	California	Safeway/Fortuna
95.	Moiselle Bruns	Lubbock	Texas	Albertsons

Brandenberg

144. Christine Richard	Washington	NH	Price Chopper or Shaw's, W. Lebanon, NH
143. Ann M. Leitgeb	Mt. Dora	FL	
142. Alfredo M. Gonzalez	West New York	NY	
141. Kerry Cline	Norwalk	CT	Stop & Shop/Norwalk
140. David DeWitt	Sacramento	CA	
139. Matthew Campbell	Alexandria	VA	Giant
138. Bert Miller	St. Augustine	FL	
137. Helen Miller	St. Augustine	FL	
136. Anthony Borra	St. Augustine	FL	
135. Christina Borra	St. Augustine	FL	
134. Danielle Bayliss	Manhattan	KS	Dillon's Manhattan, KS
133. Cara Johnsmeyer	Whitestone	NY	Waldbaum's, College Point
132. Jennifer Harte	Albany	NY	Price Chopper, Albany, NY
131. Philip Ide	Lancaster	PA	
130. Christine Malalan	Mount Vernon	New York	Stop & Shop / Yonkers
129. Dana Goldstein	Berkeley	CA	Berkeley Bowl
128. Monica Engebretson	Sacramento	CA	
127. Denise Ciotto	South Plainfield	NJ	Stop & Shop, Piscataway
126. Donald Paul Gates, Jr.	Charlottesville	VA	
125. Laurel Emerson	Rapid City	SD	
124. Sheryl Dempsey	Germantown	Maryland	Shoppers Food Warehouse
123. sue johnson	kittery	maine	shaw's
122. Sybil Soukup	Clear Lake	Iowa	
121. Tana Glavocich	North Brunswick	NJ	Black Forest Acres - Hightstown, NJ
120. Ecegul (A.J.) Elterman	Flushing	NY	Queens Health Emporium, Queens, New York
119. Scott Burnett	Gaithersburg	MD	
118. Joan Armer	Grass Valley	California	Briarpatch Coop, Grass Valley, CA
117. Jonathan Burns	Easton	PA	
116. Jeanne Gramstorff	Farnsworth	Texas	United, Perryton, TX
115. Sandie Donati	Brentwood	TN	Harris Teeter, Brentwood TN
114. Jessica Osgood	Unadilla	NY	Green earth
113. Michael Loveless	Columbus	Ohio	Wild Oats



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162.	Danielle Iammatteo	Mt. Vernon	New York	Stop and Shop, Yonkers
161.	Dian Imbriaco	Palmerton	PA	Wegmans/Bethlehem, PA
160.	James Burgess	Thamesville	Ontario	
159.	Michael J Larson II	Duluth	Minnesota	
158.	karen haid	st. louis	mo	shop n save or schnucks
157.	Aimee Lewis	Portland	Oregon	
156.	Catherine Mizerany	Arnold	Missouri	
155.	William Quirk	Goleta	Ca	Isla Vista Fud Co-op
154.	Shannon Greaney	New Milford	CT	
153.	Rita Tycho	Lawrenceville	NJ	Wegmans
152.	Alison	New York	NY	Gristedes
151.	Tim O'Boyle	Eureka	CA	CostCo-Eureka Natural Foods-Safeway
150.	M Terzicyh	Chicago	Illinois	
149.	L Terzicyh	Chicago	Illinois	
148.	Beth Hanson	Tarrytown	New York	Fairway
147.	Melinda Fox	Gainesville	FL	Publix
146.	Amy Lanier	Conyers	GA	Kroger
145.	Alexa	Sleepy Hollow	NY	

- | | | | | |
|------|------------------------|-----------------|------------|---|
| 175. | Friedlander | Canton | MI | |
| 174. | Tracy Jordan | Galivants Ferry | SC | |
| 173. | Scott S. Zabower | hellertown | pa. | Frey's Foods Hellertown, Pa. |
| 172. | W. Breslauer | ny | ny | |
| 171. | Terra John | Long Beach | CA | |
| 170. | Danielle Kelly | Minneapolis | MN | Wedge co-op |
| 169. | Jane S. Salt | Los Angeles | CA | Ralphs |
| 168. | Joanne Cooper | Bellevue | Washington | |
| 167. | William and Norma Weis | Overland Park | KS | Price Chopper/87th & Antioch, Overland Park |
| 166. | George Dobbelaere | Bonner Springs | KS | |
| 165. | Susan Dobbelaere | Bonner Springs | Kansas | Price Chopper/ Bonner Springs,KS |
| 164. | Christina Rosendaul | Boise | ID | Albertsons and Boise Co-op |
| 163. | P. Strand | Oakland | CA | Safeway |

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197.	Wendy E. Gingerich	Sarasota	Florida	The Granary
196.	Jessi	Gainesville	Florida	Ward's/Gainesville
195.	Shane Carwile	Gainesville	FL	
194.	Brian Clarke	Arlington	VA	Trader Joe's
193.	Brinton Ridgeway	Clearwater	FL	Alnbertson
192.	Grace Hoiden	Arlington	VA	Safeway
191.	Linnaea Stull	Savoy	IL	Schnucks, Urbana
190.	Laura Bridge	Riverside	RI	
189.	Scott Wilson	Highland Mills	New York	
188.	Tara DePorte	Brooklyn	NY	
187.	Robin and Andy D'Zmura	Leesburg	Virginia	Giant/Leesburg, Va
186.	Cory Mason	Queens	NY	
185.	Deirdre Balaam	Canterbury	Kent, England	Canterbury Wholefood Stores where they have lots of lovely real organic food and definitely free-range eggs. That's what we can eat here. Lovely. No lies, no deceits. Pure organic free range. Yum yum. All checkable by anyone interested. Nothing to hide, you see.
184.	Amanda M. Benson	Knoxville	Tennessee	Nature's Pantry/Knox. Community Food Co-op
183.	Sandra cardona	Puteaux	France	
182.	Kelly Shay	Bethlehem	PA	Giant/Hellertown
181.	Kay Harper	Kansas City	MO	
180.	Edna Weigel	Sierra Vista	AZ	Bisbee Food Co-op, Bisbee, AZ
179.	K. C. Mueller	Chicago	Illinois	
178.	Thomas Herne	Cliffside Park	NJ	
177.	Shirley Mohr	Columbia	MD	
176.	Noam Mohr	Columbia	MD	
	Bee			



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211.	Don Lutz	Gainesville	Florida	
210.	Karen Werman	Sarasota	Florida	Publix
209.	mary ray hoffer	Gainesville	FL	Publix - Hunter Crossing or Spring Hill
208.	Craig S. Volland	Kansas City	Kansas	
207.	Garett Greenhalgh	martinez		
206.	Dana Whitaker	Tampa	Fl	
205.	Caleb Stone	somerville	ma	
204.	Nicole Milano	Cape Coral	FL	Publix, Cape Coral
203.	Golden Dotter	Santa Cruz	California	Staff of Life
202.	Erik Hagen	Cupertino	CA	Whole Foods/Cupertino
201.	Rob Lewis	Berkeley	CA	Berkeley Bowl, Berkeley, CA
200.	Celia Bills	Ocala	Florida	Publix
199.	Laura Anderson	Ocala	Florida	Mother Earth

Organic Meat Company Publicly Traded
Excerpts from Press Release January 2002

American Capital Invests \$8.5 Million in Organic Poultry Processor
Friday February 1, 1:23 PM EST

BETHESDA, Md., Feb 1, 2002 /PRNewswire-FirstCall via COMTEX/ --
American

Capital Strategies Ltd. (ACAS

</jsp/qt/full.jsp?time=0&symbol_search_text=ACAS>) announced today that
it

had invested \$8.5 million in senior subordinated notes to recapitalize
Petaluma Poultry Processors Inc. as part of an acquisition financing.
Petaluma management is participating in the transaction in the form of
preferred equity. The senior lender is U.S. Bank and the equity group
is led

by Vail, Colo.-based Booth Creek Management Corp. Petaluma is an
integrated

producer, distributor and marketer of organic and natural fresh chicken
meat. It was the first company to sell chicken with the U.S. Department
of

Agriculture certification for organic poultry, trademarked as Rosie the
Organic Chicken.

"American Capital is off to a strong start in 2002," said Chief
Operating

Officer Ira Wagner. "Our first investment was a buyout, and this, our
second

of the year, is a mezzanine investment supporting an equity sponsor in
a

company producing a branded niche consumer product. While senior
lenders

continue to wait out the recession, we anticipate more opportunities to
invest in strong middle market companies requiring access to capital."

American Capital has invested \$400 million in middle market companies
in the

last 12 months.

"Petaluma is the dominant west coast player in the rapidly growing and
highly profitable organic chicken market," said American Capital

Principal

John Thornton. "It is able to leverage significant barriers to entry to
its

market: Petaluma is among the few companies with USDA organic
certification,

distributes a broad product line of poultry products, and possesses the
significant expertise required to raise birds organically and achieve
acceptable yields."

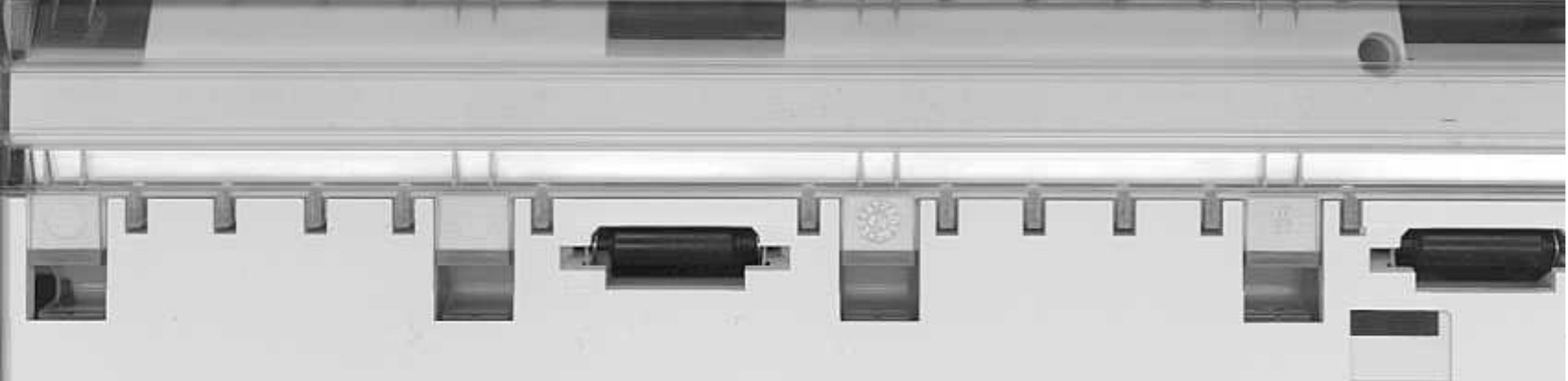
Petaluma, based in Sonoma County, Calif., saw sales increase
significantly

in 2001, consistent with the growth of the overall natural and organic
food

markets. The company was founded in 1969 to serve the ethnic poultry
markets

in the San Francisco Bay Area. Petaluma now employs several hundred
people

and operates a hatchery, chicken ranches, a processing plant and a feed
mill.



"American Capital and our other new investment partners will allow Petaluma to continue to be the market leader in organic chickens," said Petulama Chief Executive Officer Darrell Freitas. "We will continue to build market share by focusing on the customer, maintaining the highest quality standards and expanding our product line."

American Capital is a publicly traded buyout and mezzanine fund with capital resources exceeding \$1 billion. American Capital is an equity partner in management and employee buyouts; invests in debt and equity of companies led by private equity firms, and provides capital directly to private and small public companies. American Capital funds growth, acquisitions and recapitalizations. The Company has paid and declared \$8.35 per share in dividends since going public in 1997. Companies interested in learning more about American Capital's flexible financing and ability to provide senior debt, subordinated debt and equity should contact Mark Opel, Principal, at 800-248-9340, or visit the website at <http://www.AmericanCapital.com>.

This press release contains forward-looking statements. The statements regarding expected results of American Capital Strategies are subject to various factors and uncertainties, including the uncertainties associated with the timing of transaction closings, changes in interest rates, availability of transactions, changes in regional or national economic conditions, or changes in the conditions of the industries in which American Capital has made investments.

Date: Thu, 17 Dec 1998 15:43:13 -0400
From: hawiaa@juno.com (Joanna L Hildebrand)
Subject: H A Wallace Comments on USDA Issue Paper #1

This message contains comments from the Henry A. Wallace Institute for Alternative Agriculture on USDA Organic Option Paper #1, Livestock Confinement in Organic Production Systems. A copy of our comments is also found on the Institute's Web site at: www.hawiaa.org.

This USDA option paper, along with two others, were published in the Federal Register October 28, 1998 and are found on the USDA National Organic Program Web site at www.ams.usda.gov/nop. The deadline for submission of public comment was December 14, 1998.

Kathleen Merrigan and Mark Keating

Comments on Issue Paper 1
Livestock Confinement in Organic Production Systems

The Henry A. Wallace Institute for Alternative Agriculture appreciates this opportunity to evaluate options for implementation of the Organic FoodProduction Act (OFPA). We support the Department's goal of clear, consistent regulations that stimulate the growth of organic markets, satisfy consumer expectations, and allow organic producers flexibility in making site-specific, real-time management decisions. Our response to the options presented in Issue Paper 1 is consistent with, and an expansion upon, the comments on the Proposed Rules for the National Organic Program we submitted on April 30, 1998.

Resolving the confinement issue is an essential step towards the development and implementation of credible organic livestock production standards. At its heart, organic agriculture represents an integrated and interrelated group of management practices which run contrary to the concentration which characterizes much of conventional agriculture. By carefully balancing the needs of animals with the resources they provide, organic livestock management can contribute to a diversified and profitable farm. By contrast, the proliferation of conventional intensive livestock confinement systems has created a host of environmental, economic and animal welfare problems. Inappropriate waste disposal practices, financial domination by vertically integrated corporations and breeding practices driven by volume of production, not vigor of the animal, are undermining conventional livestock production. Recognizing how intensive livestock production has impacted animals, the environment, farming communities, and human health, consumers are demanding alternatives. Organic production standards which responsibly and humanely address the issues of space and mobility will reward farmers for reintroducing animals into their management systems in ways which support environmental and economic sustainability.

Standards pertaining to confinement and mobility will help to integrate livestock production into an operation's nutrient management strategy. Not every producer will maintain livestock, but those that do should balance the needs of their animals with the other components of their operation. The requirement that animals have access to an outdoor environment

commentson the Proposed Rules of the National Organic Program.

(2) The Wallace Institute recommends that temporary denial of access to the outdoors to organically raised livestock may be justifiable due to inclement weather, the health, safety and well being of the animal, and protection of soil and water quality. Under certain conditions, organic livestock producers need the discretion to prohibit temporarily the accessof the animals under their care to the outdoors. Justifiable conditions for restriction include protecting animals from the elements, providing health care treatment, or preventing excessive damage to soil and water resources. The length of the indoor confinement is not as important as therequirement that producers keep the period as brief as possible. For example, severe weather may necessitate extended intervals of restriction as long as the producer provides free access to the outdoors when conditions permit. Justification for restricting access to the outdoors should be carefully detailed in the operation's approved farm plan and reflect the well recognized factors - such as climate and animal life cycles - most likely to impinge on unrestricted access.

(3) The Wallace Institute recommends that certified livestock operations berequired to provide ruminants access to managed pasture. The term "managedpasture" should be interpreted as a distinct, organically certified field which is maintained to produce animal forage. Organically raised ruminantsshould receive a significant portion of their nutritional requirements frommanaged pasture. Pasture based rotational grazing systems provide substantial animal welfare as well as soil and water conservation benefits. Additionally, requiring pasture grazing for ruminant production will helpto correlate the of size an operation with its impact upon the local environment. Operations which use their land resources to provide a substantial portion of their feed requirement (as well as to accept the attendant manure) will be able to maintain larger herds than those that donot. We are aware that certain private certification standards currently do not require access to pasture, but we believe that adopting this provision in national standards will best protect and promote the integrityof organic production.

(4) The Wallace Institute recommends a prohibition on the use of cages forthe confinement of organically raised poultry. To constitute a clear alternative to conventional production systems, organic standards must prohibit those practices most closely associated with factory farming. Many currently certified poultry operations have proven that organic production is possible without the use of cages. Caging poultry is incompatible with organic approaches to animal welfare and health maintenance, and is inconsistent with consumer expectations. In addition to the prohibition on confining birds in cages, certified poultry production operations need to comply with the access to the outdoor requirement contained in recommendation (1). Our preference is that poultry producers provide managed pasture for the animals they raise, but we do not recommend requiring it. Pasture raised poultry is an excellent production option for some producers, but others may prefer to use alternative systems which provide their animals equally satisfactory accessto suitable outdoor conditions.

(5) The Wallace Institute recommends that the Secretary provide acceleratedreview to standards for access to the outdoors in swine production operations. State and private certifying agents have long maintained

confinement standards for dairy animals and poultry because producers could make an organic claim on certified milk products and eggs. However, because the Food Safety and Inspection Service has prohibited using the term organic on meat labels, analogous standards for livestock raised solely for their meat have not appeared. The recent increase in consumer demand for pork products has created a potentially lucrative market for which current certification standards provide little guidance. At the same time, many pork producers are adopting new production systems such as hoop houses, pasture farrowing and rotational grazing which may be compatible with organic principles. The Secretary should facilitate implementation of confinement standards for pork production to enable certified producers to enter this market expeditiously. We strongly believe that a grass-based system such as managed pasture is the most suitable environment in which to raise organic swine.

(6) The Wallace Institute recommends that the Secretary work with the NOSB and a Technical Advisory Panel representing the organic livestock production community to develop species-specific confinement standards. The development of confinement standards suitable for individual species will require a significant investment of resources. However, intense consumer interest in livestock produced through alternative production practices should make such standards a high priority for the NOP. The Secretary should rely upon the NOSB as his principal adviser for establishing confinement standards. In addition, the Secretary should devote resources to recruiting a qualified Technical Advisory Panel drawn from experienced producers and certifying agents to provide an authoritative analysis of existing standards and potential improvements.

DISCUSSION

Recommendations of the National Organic Standards Board

The NOSB has outlined a position on animal confinement which provides a constructive framework for developing more comprehensive standards. The Board grounded its work in the belief that livestock production environments which replicate natural conditions are best suited to minimize stress and promote health. In 1994, the NOSB recommended that certified operations provide "access to shade, shelter, fresh air, and daylight suitable to the species, the stage of production, the climate, and the environment." The Board also proposed that design of animal housing must accommodate "the natural maintenance, comfort behaviors, and the opportunity to exercise" required by specific species. These recommendations established guidelines for strict but achievable confinement standards capable of reflecting differences among species, their stage of development, and variation in climatic and environmental conditions. The Board coupled species-specific welfare requirements with considerable leeway for producers and certifying agents to flesh out actual site-specific conditions in an approved farm plan. This approach was designed to insure protective baseline standards for livestock living conditions while affording producers flexibility to meet those requirements.

In 1995, the NOSB strengthened its recommendation on organic livestock living standards by specifying the conditions under which temporary restriction to indoor housing may be justified. These conditions are limited to inclement weather, the health care, safety and well being of

the livestock and protection of soil and water quality. At its 1998 Ontario meeting, the NOSB reaffirmed its earlier positions on confinement and recommended that no exceptions be allowed for large livestock concentrations. While the Board did not further define large livestock concentrations, it recognized that, by contrast, organic operations must address the natural space and mobility needs of the animals they raise. The work of the NOSB has balanced the interests of animal welfare, variation between species, producer discretion, and environmental variables to create a workable, enforceable, and understandable definition of organic livestock management. To develop a credible confinement standard, the USDA should adopt the recommendation that exceptions to space and mobility requirements can only be temporary and must be based on the conditions outlined by the NOSB.

Current Organic Livestock Production Practices

The Food Safety and Inspection Service's prohibition on labeling meat or meat products as organic has hampered the development of certification standards for the production of livestock. Currently, fluid milk, related products including yogurt and cheese, and eggs are the only food commodities derived from animals which can be labeled as organically produced. In response to these opportunities, state and private certifying agents have developed a variety of standards for the certification of dairy and poultry layer operations. There has been little agreement, however, on what constitutes an appropriate standard for confinement. For example, different standards for poultry certification in the United States currently vary from caged birds, to free-roaming, to a requirement for outdoor access. Similarly, the standards for certification of dairy herds allow for everything from pasture based rotational grazing to dry lot operations.

The absence of industry consensus on appropriate livestock standards, and the confusion it creates when consumers discover the wide array of conditions currently allowable under different standards, makes the development of a clear and communicable NOP policy especially important. Concerned organic consumers used the first round of comment on the Proposed Rules of the National Organic Program to express their strong support for a policy on confinement which clearly requires access to the outdoors. An analysis conducted by the group Organic Watch of 201,794 comments posted on the NOP Web site identified 57,911 (28.70% of the total) responses which favored a stronger requirement for access to the outdoors for livestock.

Potential Benefits of Organic Production Systems

Just as organic production represents a systems approach (responsiveness to natural cycles, strength through diversity), intensive confinement production is also predicated on interrelated components. However, with the confinement approach, fixation on a single component - yield - causes other variables in the system to be compromised. Breeding animals for high feed conversion rates and rapid weight gain means sacrificing properties such as natural immunity to disease. Forcing vast numbers of animals to live in cramped quarters contaminated with their own waste insures that synthetic medications will become required treatment. Mandating access to the outdoors is a solid first step towards resolving many of the animal health problems which plague intensive confinement operations. By establishing a relationship between an operation's available land

appropriate to their species moves the production paradigm away from concentration and high yield towards integration with available resources and environmental conditions. Confinement standards will require operations to identify and sustain linkages between the number and variety of animals they raise and available land resources. In developing a farm plan for livestock operations, organic producers will think in terms of what type and how many animals their land will support, not withstand.

The Wallace Institute believes that none of the four policy options outlined in the Confinement Issue Paper provide an adequate expression of the fundamental space and mobility requirements for organically raised livestock. The USDA should strengthen its position by requiring that certified operations provide access to the outdoors for all animals under conditions appropriate to each species. While requirements can include justifiable conditions for exceptions, the organic standards should acknowledge that restrictions on access to the outdoors can only be temporary. By mandating access to the outdoors for all animals and establishing species-specific conditions for compliance, the USDA can facilitate conversion to organic systems, satisfy consumers' expectations and position organic producers to compete in international markets.

Note: Standards for the certification of aquaculture production are receiving increased attention within the organic community, and are usually considered in the context of livestock operations. While the Wallace Institute supports the development of aquaculture standards and believes that they should be viewed as livestock operations, our comments on Issue Paper 1 are limited to the consideration of land-based animal production. Standards pertaining to confinement in aquatic systems are too rudimentary and untested to be evaluated side by side with those for land-based operations. By contrast, extensive experience with certification of land-based systems, primary for the production of ruminants and poultry, provides sufficient precedent from which to derive comprehensive national standards. Issues related to confinement, mobility, and stocking rates in aquaculture operations need to be more thoroughly assessed in the production setting before they can be translated into meaningful standards.

Recommendations

(1) The Wallace Institute strongly recommends that certified livestock operations be required to provide access to the outdoors to all animals under conditions appropriate to their species. The term "access to the outdoors" should be interpreted as the ability of an animal to move freely from its enclosure into an open air environment with suitable ground cover. The simulation of a natural environment is a cornerstone provision in organic livestock production systems. An environment which allows animals to engage in feeding, resting, and grooming behavior compatible with their inherent preferences is best suited to minimize stress and promote vigor. Because the satisfactory amount and condition of the outdoor environment is dependent on the type of livestock, the Secretary should implement specific standards for individual species. Requiring that organic livestock producers provide access to an outdoor environment suitable to the needs of specific species will help balance the animal and land resources of certified operations. A clear commitment to outdoor access will also conform with the expectations of organic consumers as reflected in the overwhelming support for such access voiced in the first round of

resources and the number of animals it can raise, the requirement for access to an outdoor environment appropriate to each species provides a foundation for successful nutrient management. Certified livestock operations will balance their land and animal resources to provide feed (in cases of managed pasture) as well as dispose of manure. Access to the outdoors can also be an integral factor in other production considerations including disease suppression and the reduction of aggressive behavior.

Recent research supports the understanding that organic livestock production practices are linked to with reduced animal stress, strengthened immunity and reduced pest infestation. Data recently published in Science identified a strong positive correlation between the percentage of grain fed to cows and the concentration of *E. coli* in their rumens. The authors concluded that a hay or pasture based diet could be significantly less likely to support *E. coli* populations, including potentially pathogenic strains, than the high corn diets fed to confinement animals. Additionally, confinement poultry operations are experiencing well documented disease and parasite resistance problems with the increasingly narrow genetic base found in the most commonly used breeds. Because organic producers have to consider multiple variables when selecting breeds, they will generally employ and preserve a much broader amount of genetic diversity. The Wallace Institute believes that research in genetic diversity is a top priority for determining how organic operations can overcome the production problems plaguing conventional production.

Conclusion

To deliver livestock standards which producers, certifiers, and consumers can embrace and support, the Secretary should establish a firm requirement that all organically raised animals enjoy access to the outdoors under conditions suitable to their species. With standards for ruminants, the requirement should entail access to a managed pasture under organic management which provides a significant portion of the animals' nutritional requirements. In conjunction with the NOSB and a Technical Advisory Panel of industry experts, the Secretary should develop and implement species-specific conditions to satisfy the outdoor access requirement. The Final Rules of the National Organic Program should acknowledge that temporary restrictions on access to the outdoors for organically raised livestock are allowable only for reasons of inclement weather, the safety and welfare of the animals, or the protection of soil and water resources.
